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To Whom It May Concern,

The Great Lakes Hydroponic Association would like to comment on the proposed revisions to the United States Standards for Grades of Greenhouse Tomatoes as published in the Federal Register, Wednesday, May 31, 2006 (Volume 71, Number 104, Pages 30860-30861).

The Great Lakes Hydroponic Association is comprised of hydroponic tomato and other vegetable crop growers located in the Great Lakes States of Ohio, Michigan, Wisconsin and New York. The association expresses concern over the standard pack definition using diameter specifications, specifically that "not more than 10% of tomatoes by count will vary by more than ½" in diameter." Measuring tomatoes by size and not count will force small, independent tomato growers to heavily invest in cost prohibitive sorting machinery. This will present a significant financial challenge for these growers in the marketplace. In light of this, we support using a marked count system to determine size in large scale greenhouse operations but also suggest that small growers (size to be defined) should be exempt from these standards. The GLHA suggests that a "small" grower could be defined by acreage of production (suggest  $\leq 2$  acres), annual yield of production ( $\leq$  one million pounds), or by market (local retailer or restaurant, farmer's market, etc).

The GLHA appreciates the opportunity to comment on the proposed revisions to the Federal Register and would like to continue to work with the USDA to solidify these standards.

Sincerely,

Bill VanScoy  
President  
Great Lakes Hydroponic Association

Beth Fausey  
Program Manager  
Ohio State University Extension